

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

GRACIELA GALINDO, JESUS GALINDO
Sr., EDITH GALINDO, individually and
as Next Friend of MARGARITA GALINDO,
and as Representative of the ESTATE OF
JESUS MANUEL GALINDO; ERICA
LOZANO, as Next Friend of JOHNATHAN
GALINDO and JACOB GALINDO; and
JANNETTE FLORES ESTRADA, As Next
Friend of LESLIE ESTRADA,

Plaintiffs,

v.

Cause No. 10-CV-454-DB-NJG

REEVES COUNTY TEXAS; THE GEO
GROUP, INC.; PHYSICIANS NETWORK
ASSOCIATION; And in their individual
capacities: VERNON FARTHING, M.D.,
WALTER BRADY, D.O.; RICHARD FEARS,
P.A.; JAMES FITCH; LOU ANN MILLSAP,
R.N.; FNU BULLOCK; Warden DWIGHT
SIMS; Capt. CHAD DEVIVO; Lt. KENNETH
MARTIN; JAMES BURRELL, Federal
Bureau of Prisons (BOP) Privatization
Management Branch Administrator;
MATTHEW NACE, Chief, BOP Acquisitions
Branch; EDUARDO DE JESUS, M.D., BOP
Medical Auditor; and DONNA GRUBE, BOP
Contracting Officer,

Defendants.

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MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFFS

Gouri Bhat, counsel for Plaintiffs in the above-captioned matter, respectfully moves for leave to withdraw as counsel pursuant to Local Rule AT-3. In support of this motion, counsel states as follows:

1. Gouri Bhat is currently one of several counsel of record for Plaintiffs in the

above-captioned matter.

2. This matter was filed on December 7, 2010, while Ms. Bhat was an attorney at the ACLU of Texas Foundation. Ms. Bhat's work on this matter commenced and occurred entirely while she was an attorney at the ACLU of Texas Foundation.

3. Ms. Bhat left her employment at the ACLU of Texas Foundation on February, 1, 2011, and joined a private law firm. Her current law firm has no co-counsel agreement or compensation arrangement with other counsel for Plaintiffs in this matter.

4. If Ms. Bhat withdraws as counsel, Plaintiffs in this matter will continue to be represented by the following counsel of record:

Leon Schydlower
210 N. Campbell Street
El Paso, Texas 79901

Miguel Angel Torres
210 N. Campbell Street
El Paso, Texas 79901

Lisa Graybill
ACLU of Texas Foundation
P.O. Box 12905
Austin, Texas 78711

5. Plaintiffs in this matter have been informed of Ms. Bhat's need to withdraw as counsel and have expressly given their approval for such withdrawal.

6. Ms. Bhat hereby submits that Plaintiffs will continue to be ably and adequately represented by the above-listed counsel, and accordingly will suffer no prejudice as a result of her withdrawal.

WHEREFORE, the undersigned requests that the Court enter an Order granting her leave to withdraw as counsel of record for Plaintiffs in this proceeding.

Dated: March 31, 2011

Respectfully Submitted,

/s/ Gouri Bhat

Gouri Bhat
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served upon all counsel of record via CM/ECF on this 31st day of March, 2011.

/s/ Gouri Bhat
Gouri Bhat